

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, DC 20554

*MAR 25 1993*

In the Matter of	)	)
Petition of U S WEST Communications, Inc.	)	CC Docket No. 97-149
for Waiver of Sections 61.45(d), 61.46(d) and	)	CCB/CPD 98-7
69.152 of the Commission's Rules	)	

**REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.**

U S WEST Communications, Inc. ("U S WEST") submits this Reply to the Comments regarding its Petition for Waiver ("Petition") herein.<sup>1</sup> In that Petition, U S WEST seeks permission to increase -- temporarily -- its multi-line business ("MLB") End User Common Line ("EUCL") charge. The increase, which would remain in effect for six months, would enable U S WEST to recover the amount (as determined by the Federal Communications Commission ("Commission")) it under-recovered from its MLB customers during the period July-December, 1997.<sup>2</sup> The Commission determined that U S WEST had "systematically" underestimated its Base Factor Portion ("BFP") over the years; it thus prescribed the per-line BFP that

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<sup>1</sup> U S WEST Petition for Waiver filed Feb. 2, 1998. Public Notice, U S West Petitions for Imposition of End User Common Line Charges, CC Docket No. 97-149, DA 98-224, rel. Feb. 5, 1998. Comments filed Mar. 9, 1998 by AT&T Corp. ("AT&T"), Arizona Payphone Association, International Communications Association, American Public Communications Council ("APCC"), Bell Atlantic Telephone Companies ("Bell Atlantic"), Sprint Corporation ("Sprint"), MCI Telecommunications Corporation ("MCI") and Northwest Payphone Association.

<sup>2</sup> In the Matter of 1997 Annual Access Tariff Filings, CC Docket No. 97-149, Memorandum Opinion and Order, FCC 97-403, rel. Dec. 1, 1997 ("Refund Order"), pet. for recon. pending.

U S WEST must use in setting Carrier Common Line ("CCL") and EUCL rates for the 1997-98 tariff year, and ordered U S WEST to make refunds to the interexchange carriers ("IXC") to the extent the prescribed BFP reduces its CCL rates.<sup>3</sup>

AT&T and MCI oppose U S WEST's Petition, though their interest in this matter is somewhat hard to fathom. The money U S WEST asks to be allowed to collect will come from its MLB customers, not from the IXC's. AT&T and MCI thus have no direct interest in this matter. Any concerns they might express for U S WEST's end users are belied by their own actions in passing through Presubscribed Interexchange Carrier Charges ("PICC") to their own customers. This pass-through (unlike U S WEST's proposed temporary charge) appears to be permanent. The alacrity with which AT&T and MCI moved to impose these charges on their customers has not been matched by any action on their part to implement rate reductions on account of the access charge reductions that accompanied the introduction of the PICC.

By contrast, Sprint takes a more reasonable position, recognizing the rights of the affected local exchange carriers ("LEC") to recover the amounts they will lose by reason of the Commission's decision to change the BFP forecasting methodology.<sup>4</sup>

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<sup>3</sup> Id. ¶ 84. In ordering refunds, the Commission made no attempt to balance the interests of U S WEST against its IXC customers, as required by the Commission's decisions and applicable Court of Appeals precedent. (See Comments of U S WEST Communications, Inc., filed Jan. 21, 1998 at 3-9 in support of Bell Atlantic's Dec. 31, 1997 Petition for Reconsideration.) The Refund Order is thus invalid on its face.

<sup>4</sup> Sprint at 3.

AT&T, MCI and the APCC claim the Commission may not grant U S WEST's Petition because to do so would constitute retroactive ratemaking.<sup>5</sup> They are wrong. U S WEST is not asking the Commission to increase the rates for services it previously rendered; it is asking the Commission for permission to institute temporary, prospective increases on certain EUCL rates. U S WEST would impose these charges in the future for future service. That is not retroactive ratemaking, and nothing in the Communications Act precludes the Commission from granting U S WEST's Petition.<sup>6</sup>

In any case, no party challenges the Commission's power to impose retroactive rate increases, if it has notified customers of that prospect. As Bell Atlantic observes,<sup>7</sup> the Designation Order in this proceeding<sup>8</sup> put customers on notice that the LECs' BFP forecasts were at issue. Because those forecasts largely control the allocation of Common Line revenues between CCL and EUCL charges, this effectively put customers on notice that CCL and EUCL rates could change retroactively.

Sprint and Bell Atlantic both argue that the equities of the situation dictate granting U S WEST's Petition. As Sprint notes, the Commission has not questioned

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<sup>5</sup> AT&T at 6-7; MCI at 4-6; APCC at 3-5.

<sup>6</sup> By contrast, Columbia Gas Transmission Corp. v. FERC, 895 F.2d 791 (D.C. Cir. 1990), involved an attempt to backbill "a rate increase for gas already sold" (*id.* at 794). For that reason, MCI's reliance on Columbia Gas is misplaced.

<sup>7</sup> Bell Atlantic at 3.

<sup>8</sup> In the Matter of 1997 Annual Access Tariff Filings, Order Designating Issues for Investigation, Memorandum Opinion and Order on Reconsideration, 12 FCC Rcd. 11417, 11424 ¶ 13 (1997).

the reasonableness of U S WEST's overall Common Line costs; yet, if it does not allow U S WEST to recoup the amounts ordered to be refunded, U S WEST will have no opportunity to collect the full amount of those Common Line revenues.<sup>9</sup>

This result comes about because the Commission imposed -- without advance notice -- standards of accuracy on BFP forecasts in this case that it has not required in the past, even though it has required such forecasts for a number of years. The equities of this situation unquestionably favor a grant of U S WEST's Petition, and nothing precludes the Commission from taking that action.

In its Petition, U S WEST presented a revised autoregression analysis applied to aggregate company numbers, utilizing actual results for July-November, 1997, and projected data for December, 1997.<sup>10</sup> MCI complains about the use of projected data in that analysis.<sup>11</sup> Now, however, U S WEST has actual data from ARMIS reports for all of 1997. Attachment 1 to this Reply contains an updated autoregression analysis using the Commission's methodology, but on a state by state basis, the same manner in which U S WEST develops its EUCL charges. Attachment 2 then displays the effect of these results on the temporary charges proposed in the Petition, and on U S WEST's refund liability, both of which decrease substantially.

The Commission should utilize these new results -- which reflect the most current data and thus present the most accurate forecasts -- to re-determine

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<sup>9</sup> Sprint at 3. And see Bell Atlantic at 2-3.

<sup>10</sup> Petition at 6-7.

<sup>11</sup> MCI at 6-7.

U S WEST's refund liability and the amount it needs to recover from the temporary EUCL charges proposed here.

For the reasons stated, the Commission should grant U S WEST's Petition.

Respectfully submitted,

U S WEST COMMUNICATIONS, INC.

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March 25, 1998

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

LN	ITEM	SOURCE	Multiline Business End User Charge		
			A	B	C (Note 4)
1	1989 ACTUAL BFP PER LINE				
2	1990 ACTUAL BFP PER LINE				
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.06		Rev. Req Lines
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.09	\$7.06	153,220,000 1,807,693
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.85	\$7.09	158,872,000 1,867,634
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.69	\$6.85	162,633,000 1,978,196
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.29	\$6.69	169,230,000 2,106,949
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.30	\$7.29	195,031,000 2,229,545
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.35	\$7.30	209,315,000 2,389,323
10	INTERCEPT	See Note 1	4.330316266		219,914,000 2,494,428
11	X VARIABLE 1	See Note 2	0.392279899		
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$7.21	\$7.35	
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$7.28		
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$6.79		
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	\$0.49		
17	FCC ESTIMATE	1997 Direct Case Order	\$7.64		
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	\$0.36		

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

LN	ITEM	SOURCE	Multiline Business End User Charge			
			A	B	C (Note 4)	D
1	1989 ACTUAL BFP PER LINE					
2	1990 ACTUAL BFP PER LINE					
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.73			
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.12	\$5.73		
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.03	\$6.12		
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.65	\$6.03		
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.70	\$6.65		
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.71	\$7.70		
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.88	\$7.71		
10	INTERCEPT	See Note 1	1.278442176			
11	X VARIABLE 1	See Note 2	0.861741636			
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$8.07	\$7.88		
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$7.97			
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$8.01			
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	-\$0.04			
17	FCC ESTIMATE	1997 Direct Case Order	\$9.01			
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	\$1.04			
					Rev. Req	Lines
					129,268,000	1,880,971
					142,584,000	1,942,439
					147,327,000	2,034,692
					169,997,000	2,131,128
					205,254,000	2,222,585
					219,221,000	2,368,204
					233,216,000	2,467,492

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

LN	ITEM	SOURCE	Multiline Business End User Charge		
			A	B	C (Note 4)
1	1989 ACTUAL BFP PER LINE				
2	1990 ACTUAL BFP PER LINE				
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.59		Rev. Req Lines
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.81	\$5.59	23,661,000 352,973
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.02	\$5.81	25,668,000 368,474
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.16	\$6.02	27,968,000 387,027
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.49	\$6.16	30,236,000 409,001
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.09	\$6.49	33,572,000 430,957
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.90	\$7.09	38,651,000 454,309
10	INTERCEPT	See Note 1	1.253818971		38,080,000 459,806
11	X VARIABLE 1	See Note 2	0.832928155		
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$7.00	\$6.90	
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$6.95		
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$7.13		
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	-\$0.18		
17	FCC ESTIMATE	1997 Direct Case Order	\$8.02		
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	\$1.07		

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

**PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA**
**Multiline Business End User Charge**

LN	ITEM	SOURCE	A	B	C (Note 4)	D
1	1989 ACTUAL BFP PER LINE					
2	1990 ACTUAL BFP PER LINE					
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.81			Rev. Req Lines
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.58	\$6.81		25,290,000 309,374
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.84	\$6.58		25,101,000 317,881
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.40	\$6.84		26,324,000 320,836
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.29	\$7.40		27,526,000 310,087
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.78	\$7.29		28,181,000 322,313
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$8.13	\$7.78		31,341,000 335,810
10	INTERCEPT	See Note 1	-0.230415089			33,642,000 344,827
11	X VARIABLE 1	See Note 2	1.063257496			
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$8.41	\$8.13		
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$8.27			
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$7.51			
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	\$0.76			
17	FCC ESTIMATE	1997 Direct Case Order	\$8.44			
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	\$0.17			

**NOTES:**

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10,Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

LN	ITEM	SOURCE	Multiline Business End User Charge		
			A	B	C (Note 4)
1	1989 ACTUAL BFP PER LINE				
2	1990 ACTUAL BFP PER LINE				
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.23		Rev. Req Lines
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.73	\$6.23	44,818,000 599,928
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.82	\$6.73	50,146,000 621,173
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.30	\$6.82	53,533,000 654,388
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.49	\$7.30	59,285,000 676,985
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.90	\$7.49	63,835,000 710,528
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$8.23	\$7.90	69,877,000 737,415
10	INTERCEPT	See Note 1	0.713456165		74,421,000 753,514
11	X VARIABLE 1	See Note 2	0.946390788		
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$8.50	\$8.23	
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$8.37		
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$7.84		
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	\$0.53		
17	FCC ESTIMATE	1997 Direct Case Order	\$8.82		
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	\$0.45		

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

LN	ITEM	SOURCE	Multiline Business End User Charge		
			A	B	C (Note 4)
1	1989 ACTUAL BFP PER LINE				
2	1990 ACTUAL BFP PER LINE				
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$4.59		Rev. Req Lines
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.17	\$4.59	40,680,000 738,558
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.25	\$5.17	47,514,000 765,924
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.64	\$5.25	51,278,000 813,624
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.06	\$5.64	58,358,000 862,046
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.55	\$6.06	66,376,000 913,432
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.87	\$6.55	76,932,000 978,334
10	INTERCEPT	See Note 1	0.561456279		84,000,000 1,018,531
11	X VARIABLE 1	See Note 2	0.967346093		
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$7.21	\$6.87	
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$7.04		
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$6.44		
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	\$0.60		
17	FCC ESTIMATE	1997 Direct Case Order	\$7.25		
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	\$0.21		

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

LN	ITEM	SOURCE	Multiline Business End User Charge			
			A	B	C (Note 4)	D
1	1989 ACTUAL BFP PER LINE					
2	1990 ACTUAL BFP PER LINE					
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$10.15			Rev. Req Lines
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$10.27	\$10.15		26,202,000 215,049
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$9.34	\$10.27		26,910,000 218,278
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$10.39	\$9.34		25,282,000 225,610
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$10.39	\$10.39		27,471,000 220,258
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$10.21	\$10.39		27,186,000 217,963
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$10.80	\$10.21		27,523,000 224,728
10	INTERCEPT	See Note 1	12.48157498			29,872,000 230,426
11	X VARIABLE 1	See Note 2	-0.221873164			
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$10.08	\$10.80		
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$10.44			
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$9.81			
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	\$0.63			
17	FCC ESTIMATE	1997 Direct Case Order	\$11.04			
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	\$0.60			

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

## Multiline Business End User Charge

LN	ITEM	SOURCE	A	B	C (Note 4)	D
1	1989 ACTUAL BFP PER LINE					
2	1990 ACTUAL BFP PER LINE					
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$3.78			Rev. Req Lines
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$3.70	\$3.78		40,560,000 894,371
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$4.12	\$3.70		45,484,000 1,024,345
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$4.44	\$4.12		46,018,000 931,370
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$4.82	\$4.44		51,131,000 960,181
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.22	\$4.82		57,391,000 991,352
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.50	\$5.22		63,825,000 1,019,759
10	INTERCEPT	See Note 1	-0.136751567			68,519,000 1,037,841
11	X VARIABLE 1	See Note 2	1.097529998			
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$5.90	\$5.50		
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$5.70			
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$4.97			
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	\$0.73			
17	FCC ESTIMATE	1997 Direct Case Order	\$5.59			
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	(\$0.11)			

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

## Multiline Business End User Charge

LN	ITEM	SOURCE	A	B	C (Note 4)	D
1	1989 ACTUAL BFP PER LINE					
2	1990 ACTUAL BFP PER LINE					
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$4.56			Rev. Req Lines
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$4.84	\$4.56		97,921,000 1,790,690
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.20	\$4.84		107,295,000 1,846,580
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.36	\$5.20		118,824,000 1,902,805
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.25	\$5.36		126,809,000 1,972,701
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.58	\$5.25		129,175,000 2,051,079
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.52	\$5.58		142,562,000 2,130,744
10	INTERCEPT	See Note 1	2.176589436			142,411,000 2,149,893
11	X VARIABLE 1	See Note 2	0.607050102			
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$5.53	\$5.52		
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$5.52			
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$5.56			
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	-\$0.04			
17	FCC ESTIMATE	1997 Direct Case Order	\$6.26			
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	\$0.74			

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

## Multiline Business End User Charge

LN	ITEM	SOURCE	A	B	C (Note 4)	D
1	1989 ACTUAL BFP PER LINE					
2	1990 ACTUAL BFP PER LINE					
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$4.77			Rev. Req Lines
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$4.71	\$4.77		25,682,000 448,391
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$4.88	\$4.71		25,790,000 456,059
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.06	\$4.88		27,371,000 467,092
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.86	\$5.06		29,248,000 481,622
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.21	\$5.86		35,044,000 498,280
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.18	\$6.21		38,193,000 512,390
10	INTERCEPT	See Note 1	0.484822429			39,095,000 527,038
11	X VARIABLE 1	See Note 2	0.95237198			
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$6.37	\$6.18		
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$6.28			
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$6.61			
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	-\$0.33			
17	FCC ESTIMATE	1997 Direct Case Order	\$7.44			
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	\$1.16			

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

U S WEST

NORTH DAKOTA

ATTACHMENT 1  
PAGE 11 OF 15

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

LN	ITEM	SOURCE	Multiline Business End User Charge		
			A	B	C (Note 4)
1	1989 ACTUAL BFP PER LINE				
2	1990 ACTUAL BFP PER LINE				
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.89		
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.84	\$5.89	
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.81	\$6.84	
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.75	\$6.81	
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.34	\$6.75	
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.36	\$7.34	
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.45	\$7.36	
10	INTERCEPT	See Note 1	9.195318405		
11	X VARIABLE 1	See Note 2	-0.356767932		
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$7.25	\$5.45	
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$6.35		
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$5.78		
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	\$0.57		
17	FCC ESTIMATE	1997 Direct Case Order	\$6.50		
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	\$0.15		

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

LN	ITEM	SOURCE	Multiline Business End User Charge		
			A	B	C (Note 4)
1	1989 ACTUAL BFP PER LINE				
2	1990 ACTUAL BFP PER LINE				
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.63		
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.81	\$5.63	
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.01	\$5.81	
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.85	\$6.01	
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.29	\$5.85	
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.86	\$6.29	
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.95	\$6.86	
10	INTERCEPT	See Note 1	5.046017492		
11	X VARIABLE 1	See Note 2	0.177857313		
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$6.10	\$5.95	
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$6.03		
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$6.01		
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	\$0.02		
17	FCC ESTIMATE	1997 Direct Case Order	\$6.76		
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	\$0.73		

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

U S WEST

IDAHO NORTH

ATTACHMENT 1  
PAGE 13 OF 15

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

LN	ITEM	SOURCE	Multiline Business End User Charge		
			A	B	C (Note 4)
1	1989 ACTUAL BFP PER LINE				
2	1990 ACTUAL BFP PER LINE				
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$4.13		
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.46	\$4.13	
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.73	\$6.46	
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.20	\$7.73	
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.84	\$7.20	
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.23	\$6.84	
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.95	\$7.23	
10	INTERCEPT	See Note 1	5.947851741		
11	X VARIABLE 1	See Note 2	0.169990766		
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$7.13	\$6.95	
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$7.04		
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$6.42		
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	\$0.62		
17	FCC ESTIMATE	1997 Direct Case Order	\$7.23		
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	\$0.19		

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

## Multiline Business End User Charge

LN	ITEM	SOURCE	A	B	C (Note 4)	D
1	1989 ACTUAL BFP PER LINE					
2	1990 ACTUAL BFP PER LINE					
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.01			Rev. Req Lines
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.01	\$6.01		73,950,000 1,024,991
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.45	\$6.01		75,907,000 1,052,894
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.66	\$6.45		84,846,000 1,096,015
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.14	\$6.66		91,874,000 1,148,956
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.19	\$7.14		102,507,000 1,195,689
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$7.45	\$7.19		107,960,000 1,251,019
10	INTERCEPT	See Note 1	0.496352564			115,854,000 1,296,506
11	X VARIABLE 1	See Note 2	0.960886888			
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$7.65	\$7.45		
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$7.55			
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$6.39			
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	\$1.16			
17	FCC ESTIMATE	1997 Direct Case Order	\$7.19			
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	(\$0.36)			

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

## PER LINE AUTOREGRESSION USING 1991-1997 ACTUAL COMMON LINE DATA

LN	ITEM	SOURCE	Multiline Business End User Charge		Rev. Req	Lines
			A	B		
1	1989 ACTUAL BFP PER LINE					
2	1990 ACTUAL BFP PER LINE					
3	1991 ACTUAL BFP PER LINE	Col. C / Col. D	\$4.52		102,858,000	1,895,958
4	1992 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.19	\$4.52	118,120,000	1,896,003
5	1993 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.66	\$5.19	133,344,000	1,963,078
6	1994 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.66	\$5.66	139,171,000	2,048,302
7	1995 ACTUAL BFP PER LINE	Col. C / Col. D	\$5.74	\$5.66	146,903,000	2,132,905
8	1996 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.29	\$5.74	169,781,000	2,249,751
9	1997 ACTUAL BFP PER LINE	Col. C / Col. D	\$6.41	\$6.29	178,759,000	2,323,053
10	INTERCEPT	See Note 1	2.104070464			
11	X VARIABLE 1	See Note 2	0.675386986			
12	1998 AUTOREGRESSION FORECAST	See Note 3	\$6.43	\$6.41		
14	AUTOREGRESSION 97/98 PER LINE FORECAST	(Ln 9 + Ln 12) / 2	\$6.42			
15	US WEST ORIGINAL ESTIMATE	1997 Access Tariff Filing	\$5.68			
16	Revised regression versus original U S WEST Estimate	Ln 14 - Ln 15	\$0.74			
17	FCC ESTIMATE	1997 Direct Case Order	\$6.39			
18	FCC estimate versus Autoregression with 1997 Actual	Ln 17 - Ln 14	(\$0.03)			

## NOTES:

- 1 Excel INTERCEPT function using lines 3 - 9, Col A and B as inputs
- 2 Excel SLOPE function using lines 3 - 9, Col A and B as inputs
- 3 Ln 10, Col A + (Ln 12, Col B \* Ln 11, Col A)
- 4 Column C & D ARMIS 43-01 using FCC's method to determine actual lines and revenue requirement.

**FCC-PRESCRIBED BFP**

STUDY AREA	1997 - 1998		7/1 - 12/31/97		7/1 - 12/31/97	
	FORECAST		1997		EUCL	MLB EUCL
	ACCESS LINES (MLB; PRI-ISDN)	ANNUAL FILING CENTREX)	DIRECT CASE BFP/ACC LINE	FCC PRESCRIBE BFP/ACC LINE	NDERRECOVER (FCC PRESCRIBE) (PER LINE)	NDERRECOVERY (FCC PRESCRIBED) (REVENUE)
ARIZONA	7,181,508	\$6.79	\$7.64	\$0.85	\$3,064,583	
COLORADO	7,935,300	\$8.01	\$9.00	\$0.99	\$3,927,974	
IDAHO *	1,404,504	\$7.13	\$8.02	\$0.89	\$627,474	
MONTANA	1,060,032	\$7.51	\$8.44	\$0.93	\$495,467	
NEW MEXIC	2,201,820	\$7.84	\$8.82	\$0.98	\$1,083,738	
UTAH	3,648,864	\$6.44	\$7.25	\$0.81	\$1,472,053	
WYOMING	836,964	\$9.00	\$9.00	\$0.00	\$0	
IOWA	3,129,048	\$4.97	\$5.59	\$0.62	\$967,875	
MINNESOTA	7,168,872	\$5.56	\$6.26	\$0.70	\$2,501,437	
NEBRASKA	1,593,036	\$6.61	\$7.44	\$0.83	\$657,728	
NORTH DAK	726,456	\$5.78	\$6.50	\$0.72	\$261,508	
SOUTH DAK	921,300	\$6.01	\$6.76	\$0.75	\$345,031	
IDAHO PNB	105,648	\$6.42	\$7.23	\$0.81	\$42,591	
OREGON	4,323,564	\$6.39	\$7.19	\$0.80	\$1,721,991	
WASHINGT	6,790,296	\$5.68	\$6.39	\$0.71	\$2,398,846	
Total					\$19,568,296	

\* INCLUDES MALHEUR

**STATE-SPECIFIC BFP UPDATED TO REFLECT 1997 ACTUALS AND FCC-PRESCRIBED REGRESSION METHODOLOGY FOR 1998**

STUDY AREA	1997 - 1998		UPDATED 97-98	1/1 - 8/30/98	1/1 - 6/30/98	PROPOSED		UPDATED NET CCL REFUND CALCULATION
	FORECAST	1997	BFP/ACC LINE	MLB EUCL	MLB EUCL	UPDATED NET	UPDATED NET	
	ACCESS LINES (MLB; PRI-ISDN)	DIRECT CASE CC PRESCRIBE	(1991 TO 1997 ACTUAL BFP & 98 REGRESSION)	NDERRECOVER OVERRECOVERY	NDERRECOVER OVERRECOVERY	LB EUCL TEMPORAR INCREASE (DECREASE (PER LINE)	LB EUCL TEMPORAR INCREASE (DECREASE (REVENUE)	
ARIZONA	7,181,508	\$7.64	\$7.28	(\$0.36)	(\$1,305,114)	\$0.49	\$1,759,469	\$1,759,469
COLORADO	7,935,300	\$9.00	\$7.97	(\$1.03)	(\$4,086,680)	(\$0.04)	(\$158,706)	(\$158,706)
IDAHO *	1,404,504	\$8.02	\$6.95	(\$1.07)	(\$753,880)	(\$0.18)	(\$126,405)	(\$126,405)
MONTANA	1,060,032	\$8.44	\$8.27	(\$0.17)	(\$92,655)	\$0.76	\$402,812	\$402,812
NEW MEXIC	2,201,820	\$8.82	\$8.37	(\$0.45)	(\$500,255)	\$0.53	\$583,482	\$583,482
UTAH	3,648,864	\$7.25	\$7.04	(\$0.21)	(\$377,394)	\$0.60	\$1,094,659	\$1,094,659
WYOMING	836,964	\$9.00	\$9.00	\$0.00	\$0	\$0.00	\$0	\$0
IOWA	3,129,048	\$5.59	\$5.70	\$0.11	\$174,227	\$0.73	\$1,142,103	\$1,142,103
MINNESOTA	7,168,872	\$6.26	\$5.52	(\$0.74)	(\$2,644,814)	(\$0.04)	(\$143,377)	(\$143,377)
NEBRASKA	1,593,036	\$7.44	\$6.27	(\$1.17)	(\$928,544)	(\$0.34)	(\$270,816)	(\$270,816)
NORTH DAK	726,456	\$6.50	\$6.35	(\$0.15)	(\$54,468)	\$0.57	\$207,040	\$207,040
SOUTH DAK	921,300	\$6.76	\$6.03	(\$0.73)	(\$335,818)	\$0.02	\$9,213	\$9,213
IDAHO PNB	105,648	\$7.23	\$7.04	(\$0.19)	(\$9,841)	\$0.62	\$32,751	\$32,751
OREGON	4,323,564	\$7.19	\$7.55	\$0.36	\$785,677	\$1.16	\$2,507,667	\$2,507,667
WASHINGT	6,790,296	\$6.39	\$6.42	\$0.03	\$113,563	\$0.74	\$2,512,410	\$2,512,410
Total					(\$10,015,995)		\$9,552,301	\$9,552,301

\* INCLUDES MALHEUR

**INITIAL WAIVER REQUEST - WITH FCC-PRESCRIBED BFP**

STUDY AREA	1997 - 1998 FORECAST		1997 ANNUAL FILING	1997 DIRECT CASE CAPPED CC PRESCRIBE	1997 DIRECT CASE CC PRESCRIBE CAPPED BFP/LINE	1997 INITIAL		JAN., 1998 BUSINESS RATE (FINAL - POST)	INITIAL PART 69 WAIVER TO REFLECT CCL REFUND
	ACCESS LINES (MLB; PRI-ISD	ANNUAL FILING CENTREX)				PART 69 WAIVER TEMPORARY INCREASE	SPEC. PERMISSIO		
	BFP/LINE	BFP/LINE				INCREASE	OFFSET		
ARIZONA	7,181,508	\$6.79	\$6.79	\$7.64	\$7.64	\$0.85	\$9.00	\$9.85	
COLORADO	7,935,300	\$8.01	\$8.01	\$9.00	\$9.00	\$0.99	\$9.00	\$9.99	
IDAHO *	1,404,504	\$7.13	\$7.13	\$8.02	\$8.02	\$0.89	\$9.00	\$9.89	
MONTANA	1,060,032	\$7.51	\$7.51	\$8.44	\$8.44	\$0.93	\$9.00	\$9.93	
NEW MEXIC	2,201,820	\$7.84	\$7.84	\$8.82	\$8.82	\$0.98	\$9.00	\$9.98	
UTAH	3,648,864	\$6.44	\$6.44	\$7.25	\$7.25	\$0.81	\$8.69	\$9.50	
WYOMING	836,964	\$9.81	\$9.00	\$11.04	\$9.00	\$0.00	\$9.00	\$9.00	
IOWA	3,129,048	\$4.97	\$4.97	\$5.59	\$5.59	\$0.62	\$7.40	\$8.02	
MINNESOTA	7,168,872	\$5.56	\$5.56	\$6.26	\$6.26	\$0.70	\$7.45	\$8.15	
NEBRASKA	1,593,036	\$6.61	\$6.61	\$7.44	\$7.44	\$0.83	\$8.90	\$9.73	
NORTH DAK	726,456	\$5.78	\$5.78	\$6.50	\$6.50	\$0.72	\$8.69	\$9.41	
SOUTH DAK	921,300	\$6.01	\$6.01	\$6.76	\$6.76	\$0.75	\$9.00	\$9.75	
IDAHO PNB	105,648	\$6.42	\$6.42	\$7.23	\$7.23	\$0.81	\$9.00	\$9.81	
OREGON	4,323,564	\$6.39	\$6.39	\$7.19	\$7.19	\$0.80	\$8.98	\$9.78	
WASHINGT	6,790,296	\$5.68	\$5.68	\$6.39	\$6.39	\$0.71	\$7.96	\$8.67	

\* INCLUDES MALHEUR

**REVISED PART 69 WAIVER REQUEST -****STATE-SPECIFIC BFP UPDATED TO REFLECT 1997 ACTUALS AND FCC-PRESCRIBED REGRESSION METHODOLOGY FOR 1998**

STUDY AREA	1997 - 1998 FORECAST		JAN., 1998 BUSINESS RATE (FINAL - POST CENTREX)	PROPOSED MULTILINE UPDATED NET SPEC. PERMISSI	REVISED PART 69 WAIVER- (DECREAS PER LINE)	WAIVER- TEMP. MLB EUCL RATES
	ACCESS LINES (MLB; PRI-ISD	LB EUCL TEMPORA				
	(CENTREX)	(PER LINE)				
ARIZONA	7,181,508	\$9.00	\$0.49	\$9.49		
COLORADO	7,935,300	\$9.00	(\$0.04)	\$8.96		
IDAHO *	1,404,504	\$9.00	(\$0.18)	\$8.82		
MONTANA	1,060,032	\$9.00	\$0.76	\$9.76		
NEW MEXIC	2,201,820	\$9.00	\$0.53	\$9.53		
UTAH	3,648,864	\$8.69	\$0.60	\$9.29		
WYOMING	836,964	\$9.00	\$0.00	\$9.00		
IOWA	3,129,048	\$7.40	\$0.73	\$8.13		
MINNESOTA	7,168,872	\$7.45	(\$0.04)	\$7.41		
NEBRASKA	1,593,036	\$8.90	(\$0.34)	\$8.56		
NORTH DAK	726,456	\$8.69	\$0.57	\$9.26		
SOUTH DAK	921,300	\$9.00	\$0.02	\$9.02		
IDAHO PNB	105,648	\$9.00	\$0.62	\$9.62		
OREGON	4,323,564	\$8.98	\$1.16	\$10.14		
WASHINGT	6,790,296	\$7.96	\$0.74	\$8.70		

\* INCLUDES MALHEUR

## CERTIFICATE OF SERVICE

I, Rebecca Ward, do hereby certify that on this 25<sup>th</sup> day of March, 1998, I have caused a copy of the foregoing **REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.** to be served, via first class United States Mail, postage pre-paid, upon the persons listed on the attached service list.

Rebecca Ward  
Rebecca Ward

---

\*Served via hand delivery

(TRF97Acs-COS)

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Federal Communications Commission  
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Washington, DC 20554

\*Gloria Tristani  
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